

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:

PAUL HANSMEIER,  
  
Debtor.

Chapter 7

No. 15-42460

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PAUL HANSMEIER, Debtor,  
  
Plaintiff

Adv. No. 16-04124

v.

SANDIPAN CHOWDHURY and BOOTH SWEET LLP,  
  
Defendants.

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**DECLARATION OF JASON SWEET IN SUPPORT OF  
DEFENDANTS' DISCOVERY PRODUCTION**

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I, Jason Sweet, state under penalty of perjury that the following is true and based on personal knowledge.

1. I am an attorney at law licensed to practice before the Courts of the State of Massachusetts, the First Circuit, the Seventh Circuit and the Sixth Circuit. I represent the Defendants, Sandipan Chowdhury and Booth Sweet LLP, in this matter.
2. I submit this declaration in support of the Defendants' Response in Opposition to Debtor's Motion to Compel.
3. Booth Sweet LLP is a two person litigation firm with no support staff.
4. Prior to the October 24 order being entered into the record, Defendants each contacted their respective financial institutions and requested their banking statements. Because of the scope of documents and the time period requested, the Defendants were told that it would be at least 2-3 weeks before any responsive documents could be produced. Doc. 81.
5. Although Plaintiff was aware of this fact and had been told in conversation that the bank statements would be produced, he did not attempt to confer with Defendants before filing his present motion to compel. Doc. 84.

6. Defendant Booth Sweet LLP did not receive copies of its banking statements until December 5. A true, accurate and redacted copy of my email communications with our bank is attached as Exhibit A.
7. Defendant Chowdhury's bank produced paper copies of his records which required they be scanned before production.
8. All documents were then reviewed, appropriately redacted and produced to the Plaintiff at 4am CST.
9. The bank statements substantiate that the funds at issue went to cover Defendant Booth Sweet's fees and costs in the Massachusetts action. Defendant Chowdhury received none of the funds. This is in keeping with the prior statements by Defendant Booth Sweet in the Answer [Doc. 17 at ¶ 24] and elsewhere; and has been acknowledged by the Trustee and the Plaintiff throughout this litigation.

**I, Jason Sweet, hereby declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the foregoing is true and correct based on personal knowledge, and a review of the pleadings and other documents filed on the Court's docket set forth above. Executed at Cambridge, Massachusetts on this 13th day of December, 2018.**

Respectfully,

s/ Jason E. Sweet  
\_\_\_\_\_  
BOOTH SWEET LLP  
BBO# 668596  
32R Essex Street  
Cambridge, MA 02139  
Tel.: (617) 250-8619  
Fax: (617) 250-8883  
Email: jsweet@boothsweet.com

*Counsel for Defendants  
Pro Hac Vice Appearance*

From: [REDACTED] Maria [REDACTED]  
Subject: RE: Document request  
Date: December 3, 2018 at 1:13 PM  
To: jsweet@boothsweet.com

FM

Hi James, I checked in on your request and I was told you will have it later today or Wednesday the latest.

Thanks,

Maria [REDACTED]  
Assistant Branch Manager 1

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**From:** jsweet@boothsweet.com <jsweet@boothsweet.com>  
**Sent:** Monday, December 03, 2018 12:12 PM  
**To:** [REDACTED] Maria [REDACTED]  
**Subject:** Re: Document request

Maria

After speaking with the person on the phone, I was under the impression that the documents would be emailed to be that same day. Could you confirm? I need to have these to the court by Wednesday morning.

Thanks,  
Jason

On Nov 30, 2018, at 12:55 PM, [REDACTED] Maria [REDACTED]  
wrote:

Hi Jason, can you please give me a call [REDACTED].

Thanks,

Maria [REDACTED]  
Assistant Branch Manager 1



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**From:** [jsweet@boothsweet.com](mailto:jsweet@boothsweet.com) <[jsweet@boothsweet.com](mailto:jsweet@boothsweet.com)>  
**Sent:** Thursday, November 29, 2018 2:26 PM  
**To:** [REDACTED] Maria [REDACTED]  
**Subject:** Document request

Ms. [REDACTED]

A few weeks ago I requested account transactions for our company's checking account going back to 2015. I haven't heard anything and was just wondering what the status was.

Thanks,  
Jason

Jason Sweet  
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Cambridge, MA 02139  
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F: (617) 250-8883  
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Defendants.

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**CERTIFICATE OF SERVICE**

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I hereby certify that on December 13, 2018, I caused the foregoing declaration to be filed electronically with the Clerk of Court through ECF, and that the above documents will be delivered by automatic e-mail notification pursuant to ECF and this constitutes service or notice pursuant to Local Rule 9006-1(a). I also certify that the document was served via U.S. Mail first class postage prepaid on:

Paul R. Hansmeier  
9272 Cortland Alcove  
Woodbury, MN 55125

Dated: December 13, 2018

Respectfully,

/s/ Jason Sweet  
\_\_\_\_\_  
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BBO# 668596  
32R Essex Street  
Cambridge, MA 02139  
Tel.: (617) 250-8619  
Fax: (617) 250-8883  
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